

SUZANNE GREENE  
SUZANNE GREENE vs TYLER TECHNOLOGIES

August 29, 2019

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION  
4

5 CIVIL ACTION NO: 1:19-CV-01338-AT  
6

7 SUZANNE GREENE,  
8

9 Plaintiff,  
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11 vs.  
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13 TYLER TECHNOLOGIES,  
14

15 Defendant.  
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DEPOSITION OF: SUZANNE GREENE

AUGUST 29, 2019

9:53 A.M.

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1 separate module of the software?

2 A. So it's within the ExecuTime  
3 software, but they deal primarily with, like,  
4 police departments, fire departments, things  
5 of that sort.

6 Q. In your role as an implementation  
7 consultant, did you support advanced  
8 scheduling at all?

9 A. Initially, when I started with  
10 ExecuTime, I actually started out on the  
11 advanced scheduling side. But they did not  
12 see that as a good fit, and that's when I  
13 went over to the time and attendance side,  
14 and they started only hiring retired police  
15 officers and retired fire fighters to deal  
16 with that side.

17 Q. ExecuTime software consists of  
18 advanced scheduling and time and attendance?

19 A. That is correct. And --

20 Q. Am I correct that the time and  
21 attendance was sort of the basic software and  
22 that you had to purchase it in order to also  
23 purchase the advanced scheduling module?

24 A. From my understanding, yes.  
25 It's more like the -- like a preference

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1 option, so to say, in the back where you can  
2 turn on certain things like advanced  
3 scheduling and things of that sort.

4 Q. When in your career -- you said  
5 you started out supporting advanced  
6 scheduling?

7 A. Yes, sir.

8 Q. How long did you do that?

9 A. About six months.

10 Q. And after that, for the remainder  
11 of your tenure of employment with Tyler, you  
12 supported time and attendance?

13 A. That is correct.

14 Q. Did your job duties change at all  
15 as a result of that change in the module that  
16 you were supporting?

17 A. Can you be a little more  
18 specific? What do you mean as far as, like,  
19 my job duties?

20 Q. I'm not sure I can. But I'll try.

21 A. Okay.

22 Q. I'll ask it a different way. I  
23 may not be more specific, but I can ask it in  
24 a different way.

25 So it sounded like within six

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1 months of your employment, a decision at Tyler  
2 was made to move you from supporting the  
3 advanced scheduling software to the time and  
4 attendance software?

5 A. Yes, sir.

6 Q. You still had the title of -- I  
7 guess at that point, implementation  
8 consultant; correct?

9 A. No.

10 Q. Your title, at that point, was  
11 what?

12 A. So when I initially started with  
13 ExecuTime, I was a project manager. And once  
14 we were acquired by Tyler, they made a  
15 decision as far as based on experience and,  
16 you know, separating the roles, who would  
17 remain project managers and who would then  
18 change their titles to implementation  
19 consultants, and at that time, my title was  
20 changed.

21 Q. And that was a change that was  
22 separate and distinct from the change in the  
23 software that you were supporting?

24 A. So as --

25 Q. Or was that part of the same

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1 process?

2 A. It was different, I believe.  
3 I'm trying to recall the exact time that I  
4 switched over to time and attendance opposed  
5 to advanced scheduling. And it was right  
6 around the same time we were acquired. So I  
7 can't say specifically if --

8 Q. Okay. But it was a separate  
9 decision in terms of you weren't -- when you  
10 transferred over from supporting time and  
11 attendance from advanced scheduling, it wasn't  
12 like at that point you suddenly became an  
13 implementation consultant as opposed to a  
14 project manager; correct?

15 A. That is correct.

16 Q. Okay. So they happened in close  
17 proximity time-wise, but they were sort of  
18 separate decisions or events, if you will?

19 A. Yes, sir.

20 Q. Okay. So in terms of your job  
21 duties, what you did -- and we're going to  
22 talk about that at some length today -- but in  
23 terms of your day-to-day responsibilities, did  
24 they -- did those responsibilities change when  
25 you started supporting the time and attendance

1 software as opposed to the advanced scheduling  
2 software?

3 A. They were slightly different,  
4 yes.

5 Q. How so?

6 A. So, for example, with the  
7 advanced scheduling side, it's a completely  
8 different setup and a different process, you  
9 can say, than the time and attendance side.

10 Q. How did that affect your  
11 day-to-day responsibilities?

12 A. Well, it was basically -- it  
13 was, of course, a large learning curve for me  
14 going from one part of the module to another.  
15 So I definitely had to learn the time and  
16 attendance -- the entire time and attendance  
17 side of the application.

18 Q. Okay. But other than the actual  
19 learning curve and understanding the new  
20 module, in terms of what you did on a  
21 day-to-day basis in terms of your job  
22 responsibilities, did those change?

23 A. Yes. Because they're  
24 different -- they're different sides of the  
25 module. So...

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1 Q. Well --

2 A. Go ahead, I'm sorry.

3 Q. I'm sorry. Let me ask it in a  
4 different way. What things did you do once  
5 you started supporting time and attendance  
6 that you didn't do while you were supporting  
7 advanced scheduling?

8 A. So with the time and attendance  
9 side, we more so focused on clocking in,  
10 clocking out, because it was more of the time  
11 and attendance side of things. Where for  
12 advanced scheduling, the majority of my time  
13 was put into building schedules, because  
14 police officers and fire departments have  
15 unique schedules where they would  
16 automatically populate them.

17 So that took out a big bulk of  
18 what you do within advanced scheduling, which  
19 is not very common on the time and attendance  
20 side.

21 Q. So you no longer had to build  
22 schedules?

23 A. In some circumstances, I did;  
24 but majority of the time, no.

25 Q. Okay. What does it mean to build

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1 a schedule?

2 A. So to build a schedule, so let's  
3 say that we have a police officer who rotates  
4 their shifts, and one week they have Tuesdays  
5 and Thursdays off, the next week, they have  
6 Wednesdays and Fridays off. We would  
7 automatically build that schedule on the back  
8 end so that it would populate for them and  
9 they were not required to, like, clock in and  
10 clock out.

11 Q. But in terms of what your  
12 responsibility was to, quote, unquote, build  
13 the schedule, are you actually programming the  
14 software or what is it that you're doing?

15 A. No, I'm not very technical, so  
16 when it comes to, like, programming and  
17 things in depth on the technical side, I did  
18 not handle any of that. All of that would go  
19 through tickets.

20 Q. Right. So when you say you would  
21 build the software, what do you mean in terms  
22 of -- what would you do, integrate information  
23 or just fill out templates or what was your  
24 role in terms of the buildup of these -- of  
25 the advanced scheduling software?



1           A.           So as far as that's concerned,  
2           the project manager would meet with the  
3           actual client and get, like, a questionnaire  
4           filled out, which is where the client would  
5           tell us their specific policies and  
6           procedures, and we would base any schedules  
7           and anything that's done within the  
8           application off of their specific policies  
9           and procedures.

10                        So it's coming from the client,  
11           and when they tell us, okay, these are our  
12           expectations or this is how we would like to  
13           utilize the software, I would then base the  
14           schedules off of that questionnaire.

15           Q.           So you would create the schedule  
16           based on the questionnaire that the client  
17           filled out?

18           A.           Yes, that is correct.

19           Q.           So you would create the schedule,  
20           then, in the client's -- well, I guess at that  
21           point, in the ExecuTime software?

22           A.           That is correct. Yes.

23           Q.           Was there any change in your  
24           duties, as we discussed them, when your title  
25           changed from project manager to implementation

1 Q. Right. But I'm trying -- I think  
2 you're maybe a little confused about where I'm  
3 trying to -- how I'm trying to ask this.

4 I'm trying to say, you know, like,  
5 if someone asked me about my job, I would tell  
6 them, well, one of the things that I do is  
7 write briefs.

8 A. Uh-huh.

9 Q. And they might ask, well, what  
10 percentage of your job is writing briefs? I  
11 would say, well, it's probably 10 percent of  
12 the time I write briefs.

13 A. Uh-huh.

14 Q. How often are you in depositions  
15 like this? I might say that's probably 15  
16 percent of my time, and I'm not sure if I'm  
17 right. I'm just giving you an example. So I  
18 want you to translate that into your role as  
19 an implementation consultant, and I understand  
20 you don't take depositions or write briefs,  
21 but you do perform training and I understand  
22 there's a lot of different types of training,  
23 but I'm just talking about training in  
24 general. What percentage of your work time  
25 was spent training, approximately?

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1           A.           Approximately, like a  
2       guesstimate, I would say maybe 30 to 40  
3       percent as far as the actual training is  
4       concerned. Now, that's not including the  
5       setup that's required prior and things of  
6       that sort.

7           Q.           Okay. How much of the -- what  
8       percentage would you give to the initial  
9       setup?

10          A.           So the initial setup or setup  
11       throughout the project? Because there's the  
12       initial setup that we do for the power user  
13       training and there's also additional setup  
14       that we do prepping for end user, super user  
15       payroll, export training?

16          Q.           How about all setup?

17          A.           So, all setup, probably 30, 40  
18       percent as well.

19          Q.           Okay. And weekly calls?

20          A.           I would have them every week and  
21       they would be either -- well, I'm sorry.  
22       Depending on the client, it would either be  
23       weekly or biweekly.

24          Q.           Okay.

25          A.           They would range anywhere from

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1 30 minutes to an hour.

2 Q. Okay. So that's a smaller  
3 percentage of time?

4 A. Yes. Yes, sir.

5 Q. And troubleshooting would be a  
6 small percentage as well?

7 A. Yeah. And it would just kind of  
8 be throughout. So the troubleshooting is  
9 really hard to gauge, just because some  
10 clients were really great and I didn't need  
11 to help them as much, and then you have  
12 others like my more seasoned clients who  
13 would need a little bit more help.

14 Q. Okay. You mentioned that you were  
15 having to do multiple implementations at one  
16 time. Did I understand your testimony  
17 correctly?

18 A. Yes, sir.

19 Q. How many, typically, would you  
20 have at one time?

21 A. It ranged so often. It's hard  
22 to say. I would say at least --

23 Q. Between what and what?

24 A. Between 5 and 20. Like, it was  
25 really a big range as far as how many at

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1 once.

2 Q. And I take it having that many  
3 implementations at one time would create  
4 challenges for you schedule-wise?

5 A. Yes, for sure.

6 Q. And when you look at your resume,  
7 the first bullet under your title,  
8 Responsibilities, is "Manage multiple client  
9 implementations simultaneously while meeting  
10 all project planned deadlines." Did I read  
11 that correctly?

12 A. That is correct.

13 Q. So all of these implementations  
14 would have particular deadlines?

15 A. As far as, like, checklists are  
16 concerned that the project manager put  
17 together, when like the end user, super user,  
18 was supposed to be completed, things of that  
19 sort, yes, sir.

20 Q. So you didn't set the deadlines,  
21 but you had to be aware of the deadlines?

22 A. Yes, sir.

23 Q. And you were aware of the  
24 deadlines through your review of the document  
25 that is -- is that in the checklist?

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1 had to say -- oh, you're not exempt -- oh,  
2 you're exempt, aren't you, yes, of course I'm  
3 exempt. You know.

4 MR. MCKEEBY: I'm not -- that's  
5 not even on my outline.

6 MR. HERRINGTON: Okay.

7 Q. (By Mr. McKeeby) Okay. All  
8 right. Let's look at the next bullet on your  
9 -- well, let me ask you about -- about the  
10 first bullet.

11 Would you agree with me that  
12 meeting the project -- you didn't set the  
13 project deadlines, but meeting the project  
14 deadlines was your responsibility?

15 A. Yes, sir.

16 Q. That's something you kept the  
17 project manager updated on in terms of where  
18 things stood vis-a-vis your functions as  
19 identified on the checklist that the project  
20 manager created?

21 A. Can you repeat that question,  
22 I'm sorry?

23 Q. I'll try to ask it differently.

24 A. Okay. Thanks.

25 Q. Would you -- would one of the

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1 things you would do as an implementation  
2 consultant be to update the project manager in  
3 terms of where things stood on the deadlines?

4 A. Yes, but they were so involved,  
5 I didn't really need to send updates, too  
6 much.

7 Q. So it wasn't a discrete function?

8 A. Yes.

9 Q. Okay. They were involved, so they  
10 knew where things stood without you having to  
11 send in some type of report or something like  
12 that?

13 A. That is correct.

14 Q. Okay. Looking at that next bullet  
15 on the resume, it says "Build, lead and direct  
16 project teams to meet project objectives."  
17 Did I read that correctly?

18 A. Yes, sir.

19 Q. When you say "project teams," are  
20 you referring to internal Tyler teams or teams  
21 at the customer or both?

22 A. No, just the client, the actual  
23 client, their project team. I would make  
24 sure they clearly understood what the project  
25 manager already went over with them. I would

1 kind of reiterate, hey, these are your  
2 objectives, these are your deadlines.

3 Q. And again, the project team at the  
4 client would consist of a project manager  
5 typically?

6 A. It's usually a few people and it  
7 varies. I've been one place where they had  
8 ten people on their team, but I've been other  
9 places where it's only two. So it definitely  
10 varies.

11 Q. And how did you build the team,  
12 what does that mean?

13 A. They build -- you mean, how do  
14 they build -- like, how do they determine  
15 who's on their team?

16 Q. No. I mean, what did you mean in  
17 the resume that you provided to your current  
18 employer when you said you build a project  
19 team?

20 A. So I don't necessarily build the  
21 project team, so to say.

22 Q. What did you mean by that?

23 A. So I -- that's a great question,  
24 because I don't build the actual -- the  
25 actual teams.



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1 Q. But you do lead the teams?

2 A. As far as when their due dates  
3 and things are concerned, I will reiterate  
4 that, yes.

5 Q. And the project objectives, how  
6 did you know what the project objectives were?

7 A. That was based off of the  
8 project manager. And what was within the  
9 actual project plan. So even though the  
10 project manager already goes through that  
11 with the client, it's still my job to make  
12 sure they understand they have to stay on  
13 that track.

14 Q. But you had to understand what the  
15 project objectives were?

16 A. Yes, sir, like as far as the  
17 checklists and things are concerned.

18 Q. You would determine those  
19 objectives by reviewing the solution design  
20 and the project plan?

21 A. More so the project plan.  
22 Because the solution design more so gives  
23 information of their internal policies and  
24 procedures and the project plan is what the  
25 project manager puts together, actually,

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1 putting dates for their deadlines.

2 Q. The next bullet and then we will  
3 take a break, if that's okay?

4 A. Sure.

5 Q. Strong leadership and delegation  
6 skills. To whom did you delegate tasks?

7 A. To the client.

8 Q. What kinds of things would you  
9 delegate to the client?

10 A. I would do certain things like,  
11 let's say, we had the power user checklist,  
12 so it's already listed out as far as what  
13 they need to do. And I would just delegate  
14 and say, okay, these are the specific items  
15 that need to be completed by this date,  
16 pretty much like reiterating the project plan  
17 that was already put together.

18 Q. So you're delegating particular  
19 functions associated with the implementation  
20 process to someone on the project team?

21 A. Can you repeat that for me?

22 MR. MCKEEBY: Can you read that  
23 back?

24 (Record read.)

25 THE WITNESS: Yes.

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1 MR. MCKEEBY: Go off the record.

2 THE VIDEOGRAPHER: Going off the  
3 record at 11:42 a.m.

4 (A short break was taken.)

5 THE VIDEOGRAPHER: We are back on  
6 the record at 11:59 a.m.

7 Q. (By McKeeby) All right. Back on  
8 the record after a break. And I'm going  
9 through your resume. I think we're on the  
10 fourth bullet. That says you set clear  
11 expectations and goals for project teams;  
12 correct?

13 A. That is correct.

14 Q. And again, I take it the project  
15 team has the same meaning as previously used  
16 in the resume?

17 A. As the client, yes.

18 Q. And how would you set the  
19 expectations and goals, would that be in your  
20 communications with the client during your  
21 weekly calls or -- well, I'll ask it that way.  
22 Was that one of the ways that you would set  
23 the clear expectations and goals during the  
24 weekly or biweekly calls that you mentioned  
25 with the client?

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1 A. That was one of ways, yes, sir.

2 Q. What were the other ways?

3 A. We could even do an e-mail;  
4 generally speaking, I set the clear  
5 expectations and make sure they understand  
6 the goal and everything on that initial call,  
7 just kind of reiterating what the project  
8 manager set up for a timeline and for the  
9 goals.

10 Q. And the initial call is the -- the  
11 hand-off call?

12 A. Yes, sir.

13 Q. Got it.

14 And you and the project manager  
15 would be on that call?

16 A. Yes.

17 Q. Okay. Now, so I'm clear, so that  
18 the record is clear, when you were actually on  
19 site -- well, let me ask it a different way.

20 The -- you, I think, told me that  
21 between 30 to 40 percent of the  
22 implementations that you performed while you  
23 were an implementation consultant at Tyler  
24 were at the client's location.

25 A. Around about, yes, sir.

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1 Q. Right. And again, I know about --  
2 that's an approximation and the record will so  
3 reflect.

4 When you were at the client's  
5 site, I take it you were doing training?

6 A. Yes, sir.

7 Q. Okay. Were there other of these  
8 functions that we've discussed that would also  
9 typically occur at the client site when you  
10 were there?

11 A. Generally, when I was on site  
12 with the client, it was for power user  
13 training, end user and super user training;  
14 those were the main reasons I would travel.

15 Q. To be at the client.

16 A. Yes.

17 Q. Okay. And there might be some  
18 troubleshooting mixed in or something like  
19 that, but that didn't necessarily have to  
20 happen at the client site, certainly?

21 A. Right. Absolutely correct.

22 Q. Okay. So typically, then, I want  
23 to re-characterize and make sure we're on the  
24 same page, if you were at the client site on  
25 these 30 to 40 percent of the times, it would

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1 be to perform the training?

2 A. Most of the time, yes.

3 Q. Okay. And then the next part of  
4 the fourth bullet says, "Track project against  
5 timeline, milestones and budget and revise as  
6 needed"?

7 A. That is correct.

8 Q. What would you be revising?

9 A. So with that, if there was  
10 something within the progress -- I'll just  
11 give you an example. Let's say that they're  
12 behind schedule as far as doing the end user,  
13 super user training, so prior to the  
14 trainings, there's generally a checklist that  
15 is required prior to. So, for example, you  
16 have the power user checklist, that's  
17 supposed to be completed prior to the end  
18 user, super user. If it was not, then at  
19 that point, I would reach out to the project  
20 manager to let them know, hey, this needs to  
21 be revised, we may need to push out the date,  
22 and then they would actually update the  
23 project plan.

24 Q. Okay. So you wouldn't actually  
25 revise the -- the revise in that bullet in

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1 your resume doesn't mean changing the actual  
2 terms of a document?

3 A. No. That's not what that means  
4 there, no.

5 Q. Right. It means communicating  
6 that something needs to be changed and then  
7 the project manager would make that change?

8 A. That is correct.

9 Q. Got it. Okay.

10 I set up the question about the  
11 training and I didn't ask what I wanted to.

12 So when you're at -- when you're  
13 training at the facility -- and I understand  
14 sometimes it happened on the web training too,  
15 where you weren't at the facility?

16 A. Yes.

17 Q. But when you were at the facility  
18 doing the training that you described, you're  
19 there by yourself; correct?

20 A. Sometimes.

21 Q. Typically?

22 A. Typically, yes.

23 Q. Okay. Who else, on those  
24 occasions that are atypical, would the project  
25 manager might also be there?

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1 A. Sometimes yes, not very common.

2 Q. Okay.

3 A. Usually, they're just available  
4 if I need something.

5 Q. Right. But when you're doing the  
6 training -- it's a classroom-type training, I  
7 take it?

8 A. Yes, sir.

9 Q. And you are training either the  
10 super users, power users or end users in that  
11 classroom?

12 A. Yes, sir.

13 Q. And you're up in front of them  
14 doing the training?

15 A. Most of the time sitting down.

16 Q. Most of the time sitting down.  
17 Okay. But you're there typically by --  
18 there's no other Tyler employee there?

19 A. Yes, that is correct.

20 Q. That is correct. Okay.

21 What does the term, in that bullet  
22 point on your resume, "milestones" mean?

23 A. So milestones. There were two  
24 different things: There were milestones that  
25 had to be met as well as Go-Live checklists.



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1 So milestones are essentially -- they're kind  
2 of like a checklist so to say. But that's  
3 something that, you know, I would make sure  
4 that whatever the project manager put within  
5 the project plan, I need to ensure that the  
6 client's essentially meeting those.

7 Q. But is milestones the same as a  
8 deadline?

9 A. Pretty much, yes, sir.

10 Q. Okay. And if the client wasn't  
11 meeting a milestone or deadline, you would  
12 communicate that to the project manager?

13 A. Absolutely.

14 Q. And that's the kind of thing that  
15 might result in postponing a Go-Live deadline?

16 A. That could be one of the many  
17 reasons, yes.

18 Q. Now, what is the budgeting -- what  
19 is the budget -- the "Track progress against  
20 budget" mean?

21 A. So the budget, each client can  
22 purchase different amounts of hours. So  
23 depending on how many hours they had, that  
24 would be communicated from the manager to the  
25 project manager and myself.

1 And for a short period of time,  
2 we were updating the actual -- within the  
3 project plan, there was a portion that would  
4 show the hours they had and then it would  
5 subtract the time that we were working on  
6 that. So if they got under, I believe it was  
7 10 or 12 hours, then I needed to notify the  
8 project manager so then they can speak to the  
9 client and have them purchase more hours, if  
10 necessary.

11 Q. Okay. Did you ever recommend to  
12 the client that they might need more hours?

13 A. Not unless I spoke to the  
14 project manager first, no.

15 Q. Okay. You would recommend -- you  
16 would alert the project manager to the fact  
17 that they needed more hours based on the  
18 budget?

19 A. That is correct.

20 Q. Okay. And when you're saying  
21 "hours," you're meaning training hours?

22 A. Right. Yes. Yes, sir. And  
23 those hours could also be used for some  
24 troubleshooting and setup and things of that  
25 sort as well.